

SMITH LLC
JOSHUA SMITH, ESQ.

September 20, 2021

Via CM/ECF

The Honorable Norman K. Moon
The Honorable Joel Hoppe
United States District Court for the Western District of Virginia
255 West Main Street
Charlottesville, Virginia 22902

Re: *Sines et al. v. Kessler et al.*, No. 3:17-cv-00072; Correction of Error in ECF No. 1054

Dear Judge Moon and Judge Hoppe:

In Defendant Matthew Heimbach's Response to Plaintiffs' Supplemental Memorandum of Law in Support of Their Motion for Sanctions Against Him (ECF No. 1054) (the "Response"), the argument made in Section I.C was premised upon my mistaken belief that Plaintiffs' counsel had taken only one full deposition of Matthew. (See *id.* at 6-7.)

I have recently become aware, however, that Matthew did, in fact, sit for two full depositions, and not merely one deposition. I thank Plaintiffs' counsel for correcting the record in their reply.

Accordingly, I must, and hereby do, withdraw Section I.C of the Response.

I sincerely regret the error. While I trust that the Court recognizes it was in no way intentional, I nonetheless accept full responsibility for it.

Very truly yours,

/s/ Joshua Smith

Joshua Smith, Esq.

*Counsel for Defendants David
Matthew Parrott, Matthew
Heimbach, and Traditionalist
Worker Party*

CERTIFICATE OF SERVICE

I hereby certify that on September 20, 2021, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to all counsel of record in the case, as well as all ECF-registered *pro se* parties.

I hereby further certify that on September 20, 2021, I served a copy of the foregoing on the following non-ECF *pro se* parties, via electronic mail, as follows:

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I hereby further certify that on September 20, 2021, I served a copy of the foregoing on the following non-ECF *pro se* party, via first-class mail, as follows:

Christopher Cantwell (00991-509)
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/s/ Joshua Smith

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